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December 26, 2023

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Court
500 Pearl Street, Room 1040
New York, New York 10007-1312

Re: Doe v. Combs, et al., Case No. 1:23-cv-10628 (JGLC)

Dear Judge Clarke:

We are the attorneys for Defendants Sean Combs, Daddy's House Recording Studio, Inc., and Bad Boy Entertainment Holdings, Inc. (collectively, the "Combs Defendants").

We file this letter-motion to seek a modification of the recent briefing schedule (the "Motion Schedule") the Court "So Ordered" in connection with Plaintiff's motion to sue under a pseudonym (the "Motion"). [Dkt. Nos. 24 and 14-17]. All parties consent to the modification of the Motion Schedule. This is the Combs Defendants' first request for an extension of the Motion Schedule.

This action was filed on December 6, 2023, and Plaintiff filed the Motion on December 11, 2023. Defendants' acknowledged service of the Summons and Complaint on December 21, 2023, and the date on which to answer, move, or otherwise respond to the Complaint is set as February 20, 2024. The initial pretrial conference is scheduled for March 19, 2024.

Due to circumstances beyond the control of the Combs Defendants, which circumstances are of a confidential nature, we respectfully request that the Court modify the Motion Schedule to extend Defendants' time to file their opposition to the Motion from December 27, 2023 to January 17, 2024, and extend Plaintiff's time to file a reply, if any, from January 8, 2024 to January 31, 2024.

Because this action is in its early stages, and before any substantive response to the Complaint is due by any Defendant, this requested short extension of the Motion Schedule will not prejudice or inconvenience any party or cause any undue delay to these proceedings.

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We thank the Court in advance for its consideration of this requested modification of the Motion Schedule.

Respectfully submitted,

/s/Jonathan D. Davis

Jonathan D. Davis

JDD:hs

cc: Douglas H. Wigdor, Esq.
Meredith A. Firetog, Esq.
Michael J. Willemin, Esq.
Scott E. Leemon, Esq.
(All Via ECF)